

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EMBER RUSSELL,

Plaintiff,

V.

LONG VIEW RECREATIONAL
VEHICLES, INC. AND LONG VIEW
RV SUPERSTORES,
Defendant.

: CIVIL ACTION NO. 04-30031-KPN

PLAINTIFF'S MOTION TO COMPEL DISCOVERY

The plaintiff hereby moves to compel adequate responses to written discovery timely served upon the defendant. As grounds therefore, the plaintiff submits a Memorandum in support of this motion, and states that the defendant failed to respond adequately to written requests for discovery as follows: Interrogatories; 11-13, 15, 20-21 and Document Requests 1-3, 9, 11-13-22, and 24-30.

WHEREFORE, the plaintiff requests that this court:

1. Order the defendant to respond completely and fully to Interrogatories 11-13, 15, 20-21; and Document Requests 1-3, 9, 11-20, 22, and 24-30 within ten days; and

2. Award the plaintiff her reasonable attorney's fees and costs in prosecuting this motion.

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) and 37.1(B)

I certify that I have attempted in good faith to resolve or narrow the issues raised in this motion at a discovery conference, and have not been able to reach an agreement on discovery requests which are the subject of this Motion.

EMBER RUSSELL
By her attorney,

/s/ Suzanne Garrow
Suzanne Garrow BBO # 636548
Heisler, Feldman & McCormick, P.C.
1145 Main Street, Suite 508
Springfield MA 01103
(413)788-7988
(413)788-7996 (fax)

Dated: December 22, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served by electronic and first class mail upon the attorney of record for the defendants on December 22, 2004.

/s/ Suzanne Garrow
Suzanne Garrow